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4  
5 Attorneys for Defendant  
Comenity Bank

6 **IN THE UNITED STATES DISTRICT COURT**  
7 **FOR THE DISTRICT OF NEVADA**

8 NATALIA LUCERO,

9 Plaintiff,

10 vs.

11 TRANS UNION, LLC; CAPITAL ONE  
BANK (USA), N.A.; COMENITY, LLC dba  
COMENITY CAPITAL BANK; and  
GLOBAL LENDING SERVICES, LLC,

12 Defendants.  
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Case No. 2:22-cv-01334-APG-DJA

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16 **STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF TIME FOR  
DEFENDANT COMENITY BANK TO  
RESPOND TO THE COMPLAINT  
(FIRST REQUEST)**

17 Plaintiff Natalia Lucero (“Plaintiff”) and Defendant Comenity Bank, incorrectly sued as  
“Comenity, LLC d/b/a Comenity Capital Bank (“Comenity”), by counsel, hereby stipulate as  
follows:

18 1. Comenity was served with the Complaint on or about August 23, 2022, making its  
response due September 13, 2022.

19 2. Counsel for Comenity was recently retained and needs additional time to investigate  
the facts and legal claims asserted in the Complaint and to prepare an appropriate response.

20 3. Plaintiff and Comenity agree to extend the time it has to respond to the Complaint  
by 28 days, to and including October 11, 2022.

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1       4. This is the first stipulation to extend Comenity's deadline to respond to Plaintiff's  
2 Complaint and is not made for the purpose of delay.

3       DATED: September 13, 2022

4 Respectfully submitted,

5       KIND LAW

6  
7       By: /s/ Michael Kind  
Michael Kind (NSBN 13903)  
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9 Las Vegas, NV 89123  
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10      *Plaintiff Natalia Lucero*

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By: /s/ Sarah Ferguson  
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*Defendant Comenity Bank*

13      **ORDER**

14      IT IS SO ORDERED.

15        
16      \_\_\_\_\_  
17      UNITED STATES MAGISTRATE JUDGE

18      DATED: September 14, 2022 \_\_\_\_\_

22      4860-0961-5411, v. 1

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